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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11
: Case No. 22-10964 (MG)
CELSIUS NETWORK LLC, et al.¹ : (Jointly Administered)
: Debtors. :
:-----x

**THE AD HOC GROUP OF CUSTODIAL ACCOUNT HOLDERS'
JOINDER TO THE DEBTORS' REPLY IN SUPPORT OF THE DEBTORS' MOTION
PURSUANT TO SECTION 107 OF THE BANKRUPTCY CODE SEEKING ENTRY
OF AN ORDER (I) AUTHORIZING THE DEBTORS TO REDACT
CERTAIN PERSONALLY IDENTIFIABLE INFORMATION FROM
THE CREDITOR MATRIX, SCHEDULES AND STATEMENTS,
AND RELATED DOCUMENTS AND (II) GRANTING RELATED RELIEF**

The Ad Hoc Group of Custodial Account Holders (the "Ad Hoc Group") of Celsius Network LLC and its affiliated debtors (the "Debtors"),² respectfully submits this joinder (the "Joinder") to the reply of the Debtors [Docket No. 638] (the "Reply") in support of the *Debtors' Motion Pursuant to Section 107 of the Bankruptcy Code Seeking Entry of an Order (I) Authorizing the Debtors to Redact Certain Personally Identifiable Information*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); and Celsius US Holding LLC (7956). The location of Debtor Celsius Network LLC's principal place of business and the Debtors' service address in these chapter 11 cases is 121 River Street, PH05, Hoboken, New Jersey 07030.

² On August 19, 2022, the Ad Hoc Group filed the *Verified Statement Pursuant to Bankruptcy Rule 2019* [Docket No. 547].

From the Creditor Matrix, Schedules and Statements, and Related Documents and (II) Granting Related Relief [Docket No. 344] (the “Motion”).³ In support of this Joinder, the Ad Hoc Group, by and through its undersigned counsel, respectfully states as follows:

JOINDER

1. The Ad Hoc Group is comprised of individual account holders that used the Debtors’ Custody Service. The Ad Hoc Group and its counsel are currently working with the Debtors and their advisors as well as other parties in interest in these Chapter 11 Cases regarding the return of property of Custody Wallet users held by the Debtors.

2. While those discussions are ongoing, the Ad Hoc Group agrees with the Debtors that publishing the contact information consisting of home addresses and email addresses of the Debtors’ customers publicly on the docket (which is available for download on the worldwide web) puts individuals at risk of identity theft, fraud or other serious harm. The Ad Hoc Group also agrees that the Debtors satisfy the relevant standards for obtaining the relief requested in the Motion regarding the redaction of such information from the Creditor Matrix and the Schedules and Statements.

[*Concludes on Following Page*]

³ Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Motion or the *Declaration of Alex Mashinsky Chief Executive Officer of Celsius Network LLC, in Support of Chapter 11 Petitions and First Day Motions* [Docket No. 23], as applicable.

3. For the foregoing reasons, the Ad Hoc Group hereby joins the Motion and Reply and supports the Debtors' arguments and reasoning set forth therein. Nothing contained herein shall constitute a waiver of any rights or remedies of the Ad Hoc Group under title 11 of the United States Code or applicable law, including, without limitation, the right to: (i) amend, modify or supplement this Joinder, or (ii) raise any other additional arguments at a later date.

DATED: New York, New York
August 30, 2022

AD HOC GROUP OF CUSTODIAL
ACCOUNT HOLDERS
By its Counsel,
TOGUT, SEGAL & SEGAL LLP
By:

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